

REMARKS

Claims 1-15 are pending in this application. Claims 1, 3 and 14 have been amended herein.

The drawings have been objected to as failing to show the at least two indirectly driven mounting devices set forth in claim 3. Applicant respectfully submits that these elements are shown in the drawings. In particular, Figures 1a and 1b together show a directly driven mounting device ("loading platform") 112a followed by three indirectly driven mounting devices 112b. Note that the arrows (1b-1b) at the right end of Figure 1a and the arrows (1a-1a) at the left end of Figure 1b indicate that Figure 1b follows, and is a continuation of, Figure 1a. Similar structure is illustrated in Figures 2a and 2b. When viewed in this manner, it is seen that the directly driven mounting device 112a pushes the indirectly driven mounting devices 112b, as set forth in Applicant's claims. Claim 1 has also been amended to clarify this structure. Accordingly, the Examiner is respectfully requested to withdraw the objection to the drawings.

Claims 1 and 14 have been rejected as being indefinite. The present amendments to the claims are believed to overcome this rejection. With respect to claim 1, it is now clear that the mounting devices comprise respective base parts that are moved in a translatory manner in a direction of conveyance. Both the directly driven mounting device and the at least one indirectly driven mounting device are moved in the direction of conveyance. This is shown in Figures 1a and 1b (as well as in Figures 2a and 2b), where the "direction of conveyance" is represented by arrow 120. See, e.g., the last sentence on page 15 of Applicant's specification. Since claim 1 is believed to clearly recite Applicant's inventive structure, and amended claim 14 overcomes the antecedent basis issues noted by the Examiner, withdrawal of the rejection under 35 U.S.C. § 112, second paragraph, is respectfully requested.

Claims 1-3 and 7-15 stand rejected as being anticipated by Kreuzer WO 01/17691. Applicant respectfully traverses this rejection.

Kreuzer discloses a method for introducing and removing workpieces, especially vehicle bodies, into or from a treatment area by means of rotational movements. Workpieces are detachably fixed at a holding frame. The holding frame is moved together with the workpiece situated thereon at an essentially constant speed via continuous translation. Kreuzer does not disclose any *indirectly driven* mounting device(s) as set forth in Applicant's claims. Moreover, Kreuzer does not disclose the *transmission of the movement of a directly driven mounting device to an indirectly driven mounting device, e.g., via contact* between the respective devices.

As can be clearly seen in Applicant's Figures 1a,b and 2a,b, the directly driven mounting device 112a contacts, and pushes, the first indirectly driven mounting device 112b. Subsequent indirectly driven mounting devices 112b are contacted and pushed by the preceding device 112b. Quite to the contrary, Kreuzer discloses a conveyor comprising a plurality of holding frames (2) that are affixed to endless drive chains which are guided in drive chain guides (15). Thus, each holding frame (2) is *directly driven* by the drive chains, and there is *no contact between two successive holding frames (2)*.

Claims 4-6 have been rejected as being obvious over Kreuzer in view of Gilbert U.S. patent 5,012,917. Gilbert discloses an assembly line platform conveyor. A friction wheel drive and a friction wheel brake are provided for the platform conveyor. Such a conveyor apparatus is inappropriate for use in advancing workpieces through a processing zone for the surface treatment of the workpieces, as set forth in Applicant's claims. Such a surface treatment zone can comprise, for example, a paint shop or a drying oven.

In particular, a person skilled in the art would not consider Gilbert's assembly line transport apparatus to be appropriate for use in a conveyor device as claimed by Applicant. There are various reasons for this, including:

1. The assembly line platforms of Gilbert et al, as shown in Figure 7, are provided with scissor-type elevating mechanisms, having a protective bellows (26). Such bellows could not be sufficiently cleaned if they were moved through a paint shop or a drying oven. It would also be extremely laborious to construct a scissor-type

elevating mechanism which is sufficiently temperature-resistant to be moved through a drying oven.

2. Assembly line platforms are designed to allow workers to travel together with the article to be assembled on the assembly platform. As a result, assembly line platforms are built considerably broader than the article to be assembled, such as a vehicle body. In contrast, mounting devices for paint shop or drying oven conveyors are designed to be as narrow as possible in order to (a) reduce the distance between the workpiece and the painting apparatus of a paint shop, and (b) reduce the required cross section of a drying oven.
3. Assembly line platforms have a large mass that would have to be heated up to the drying temperature if the platforms were to be moved through a drying oven. This would lead to a very high energy consumption, which would be unacceptable in a manufacturing environment.
4. Assembly line platforms are intended to allow workers to travel thereon, together with the workpieces to be assembled. Accordingly, such assembly line platforms have a closed horizontal surface, usually made of wood. Such closed horizontal surfaces cannot be used in a paint shop, however, since a stream of air is led through the workpiece mounting devices from above to below in order to carry away the paint overspray. Moreover, a large closed horizontal surface of an assembly line platform would lead to the deposition of a large amount of overspray on the platform, which would be difficult to clean.

For the reasons stated above, the assembly line platforms disclosed in Gilbert are not appropriate for a conveyor device as claimed by Applicant. One skilled in the art therefore would not be expected to consider the teachings of the Gilbert reference when deciding how to advance workpieces through a processing zone for the surface treatment of the workpieces. Gilbert is not believed to be relevant prior art, and therefore it is respectfully submitted that the combination thereof with Kreuzer, as suggested by the Examiner in connection with Applicant's claims 4-6, is inappropriate.

Further remarks regarding the asserted relationship between Applicants' claims and the prior art are not deemed necessary, in view of the foregoing discussion. Applicants' silence as to any of the Examiner's comments is not indicative of an acquiescence to the stated grounds of rejection.

In view of the above, the Examiner is respectfully requested to reconsider this application, allow each of the pending claims and to pass this application on to an early issue. If there are any remaining issues that need to be addressed in order to place this application into condition for allowance, the Examiner is requested to telephone Applicants' undersigned attorney.

Respectfully submitted,



Barry R. Lipsitz
Attorney for Applicant(s)
Registration No.: 28,637
Lipsitz & McAllister, LLC
755 Main Street
Monroe, CT 06468
(203) 459-0200

Attorney Docket No.: HOE-779

Date: July 6, 2005